

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

GERALD J. BONNER,

Defendant.

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NO. 3:09-CR-263

FILED
SCRANTON

SEP 01 2009

PER

DEPUTY CLERK

I N D I C T M E N T

18 U.S.C. § 666(a)(1)(B)
(Corrupt Receipt of Bribe/Reward for Official Action
Concerning Programs Receiving Federal Funds)

THE GRAND JURY CHARGES:

At all times material to this Indictment, the Defendant GERALD J. BONNER was a member and agent of the Luzerne County Housing Authority (hereinafter referred to as "LCHA"), a local government agency within the meaning of federal law that received federal assistance in excess of \$10,000 during the one-year period beginning on January 1, 2009. A person hereinafter referred to as "UNINDICTED LCHA MEMBER #1" was also a member of the LCHA.

The defendant GERALD J. BONNER and UNINDICTED LCHA MEMBER #1 were agents of the LCHA. As members of the LCHA, the defendant GERALD J. BONNER and UNINDICTED LCHA MEMBER #1 exercised discretionary decision-making authority on behalf of the LCHA, including participating in the awarding of contracts on behalf of the LCHA.

Between on or about January 1, 2009 and on or about June 1, 2009, in the Middle District of Pennsylvania, the Defendant,

GERALD J. BONNER,

aiding and abetting UNINDICTED LCHA MEMBER #1, and aided and abetted by UNINDICTED LCHA MEMBER #1, did knowingly, intentionally and corruptly solicit and demand for the benefit of UNINDICTED LCHA MEMBER #1, and did accept and agree to accept, a thing of value from another person, namely, cash in an amount less than \$5,000, intending to be rewarded in connection with support GERALD J. BONNER and UNINDICTED LCHA MEMBER #1 provided to a business owner, hereinafter referred to as "THE UNINDICTED BUSINESS OWNER" who entered into contracts with the LCHA.

It was part of the offense that the defendant GERALD J. BONNER and UNINDICTED LCHA MEMBER #1, acting in their capacity as members of the LCHA, supported the efforts of THE UNINDICTED BUSINESS OWNER who was seeking to enter into contracts with the LCHA involving a thing of value in excess of \$5,000.

It was further a part of the offense that, after the defendant GERALD J. BONNER and UNINDICTED LCHA MEMBER #1 supported THE UNINDICTED BUSINESS OWNER for contracts with the LCHA, THE UNINDICTED BUSINESS OWNER provided the defendant GERALD J. BONNER with cash which the defendant GERALD J. BONNER then gave to UNINDICTED LCHA MEMBER #1. The cash was paid to the defendant GERALD J. BONNER and to UNINDICTED LCHA MEMBER #1 to

reward them for past business and to influence them to support future business between THE UNINDICTED BUSINESS OWNER and the LCHA.


In violation of Title 18, United States Code, §
666(a)(1)(B).

A TRUE BILL

A large, dark, irregular redacted area covering a signature, with a horizontal line extending to the right.

Dated:

9/1/2009


DENNIS C. PFANNENSCHMIDT
UNITED STATES ATTORNEY